AI Policy

Trinity MAT

Trinity Multi-Academy Trust

Policy	**AI Policy**
Date of review	**September 2025**
Date of next review	**September 2026**
Lead professional	**Rob Marsh**
Status	**Non-Statutory**

1. Introduction

1.1. This policy document provides guidance on the responsible and effective use of Artificial Intelligence (AI) tools by staff and students within our Trust. It aims to foster innovation whilst ensuring safety, ethical considerations, and academic integrity, in line with current Department for Education (DfE) guidance and relevant legislation, including but not limited to the Data Protection Act 2018 and the Equality Act 2010. This policy should be read alongside the Trust's Data Protection Policy, which provides more information on how we handle personal data.

Artificial Intelligence (AI) is rapidly evolving and offers exciting and transformational opportunities for enhancing teaching, learning, and administrative processes. The use of AI technology also presents risks related to safeguarding, data protection, compliance, and suitability.

The purpose of this policy is to establish guidelines for the ethical, secure and responsible use of AI technologies across our whole institution community. It is a living document and will be updated as AI technology and relevant guidance evolve.

The policy aims to:

- Give teachers and staff guidance on how to use AI responsibly, ethically, and securely in their work.
- Support the use of AI to enhance teaching and learning and explore AI solutions to improve efficiency and reduce workload.

- Prepare staff, governors and pupils for a future in which AI technology will be an integral part.
- Help everyone learn about digital skills and how to think critically about AI.
- To keep students and staff safe when using AI tools, including protecting information and systems.
- Ensure that AI technologies are used ethically and responsibly by all staff, governors and pupils
- Protect the privacy and personal data of staff, governors and pupils in compliance with the UK GDPR

1.2 The Trust's approach to AI is summarised in the guidance statement below:

We will embrace the development of technology and AI, making conscious, well-informed decisions about its use, with ethics, safety and security always in mind. We fundamentally believe that the human touch, understanding and perspective is always needed in our work.

1.3 Our strategic moves will be based around the following five themes, which are also shown in Appendix A:

- Ethics, safety, security and well-being
- Enhancing teaching and learning
- Supporting efficiency
- Educating people for the now
- Preparing people for the future

2. Guidance and legislation

1 2.1. This policy reflects good practice guidelines/recommendations in the following publications:

AI regulation white paper, published by the Department for Science, Innovation and Technology, and the Office for Artificial Intelligence

Generative artificial intelligence (AI) and data protection in institutions, published by the Department for Education (DfE)

Using AI in Education: Support Materials published by the Department for Education (DfE)

This policy also meets the requirements of: UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2020

Data Protection Act 2018 (DPA 2018)

2.2 This policy follows the DfE's advice on using AI by:

- Focusing on Human Teachers: Recognising that AI can't replace the knowledge and judgment of teachers.
- Promoting Good Education: Encouraging students to develop their knowledge, skills, and critical thinking, instead of just using AI-created content.
- Helping Staff (with workload): Looking at how AI can help staff with office tasks and creating materials, giving them more time for teaching.
- Keeping Everyone Safe: Putting the safety of students and staff first when using AI tools, including following age limits and appropriate supervision.
- Knowing the Limits of AI: Pointing out that AI can sometimes be wrong, biased, and have other limitations.

3 Regulatory Principles

3.1. We follow the five principles set out in the AI regulation white paper.

Regulatory principle	WE WILL …
Safety, security and robustness	Ensure that AI solutions are secure and safe for users and protect users' data. Ensure we can identify and rectify bias or error. Anticipate threats such as hacking.
Appropriate transparency and explainability	Be transparent about our use of AI and make sure we understand the suggestions it makes.
Fairness	We will only use AI solutions that are ethically appropriate, equitable, and free from prejudice. Before using AI, we will fully consider any bias relating to small groups and protected characteristics, monitor bias closely, and correct problems where appropriate.

Regulatory principle	WE WILL …
Accountability and governance	Ensure that the governing board and staff have clear roles and responsibilities regarding AI monitoring, evaluation, maintenance, and use.
Contestability and redress	Make sure that staff are empowered to correct and overrule AI suggestions – decisions should be made by the user of AI, not the technology. Allow and respond appropriately to concerns and complaints where AI may have caused error resulting in adverse consequences or unfair treatment.

4 Roles and Responsibilities

4.1 Board of Trustees

The board of directors will:

Take overall responsibility for monitoring this policy and holding institution leaders accountable for its implementation in accordance with the Trust's AI strategy.

Review and update the AI policy as appropriate, and at least annually.

Ensure institution leaders are appropriately supported to make informed decisions regarding the effective and ethical use of AI across the Trust.

Directors will adhere to the guidelines below to protect data when using generative AI tools themselves:

- Use only approved AI tools where data is being shared (see section 5)
- Seek advice from the data protection officer / IT / AI lead, as appropriate
- Check whether they are using an open or closed generative AI tool
- Ensure there is no identifiable information included in what they put into open generative AI tools
- Acknowledge or reference the use of generative AI in their work
- Fact-check results to make sure the information is accurate

4.2 Institution leaders

Institution leaders will:

- Take responsibility for the day-to-day leadership and management of AI use in their institution
- Liaise with the data protection officer (DPO) to ensure that the use of AI is in accordance with data protection legislation
- Ensure that all staff follow the guidance set out in this policy
- Ensure staff are appropriately trained in the effective use and potential risks of AI
- Make sure pupils are taught about the effective use and potential risks of AI

4.3 Trust data protection officer (DPO)

The Trust-level data protection officer (DPO) is responsible for monitoring and advising on our compliance with data protection law, including regarding the use of AI.

Our DPO is Peter Knight and is contactable via coo@trinitymat.org

4.4 Safeguarding leads

Safeguarding leads are responsible for monitoring and advising on our compliance with safeguarding requirements, including in relation to the use of AI, such as:

- Being aware of new and emerging safeguarding threats posed by AI
- Updating and delivering staff training on AI safeguarding threats
- Responding to safeguarding incidents in line with Keeping Children Safe in Education (KCSIE)

4.5 All staff

As part of our aim to reduce staff workload while improving outcomes for our pupils, we encourage staff to explore opportunities to meet these objectives using approved AI tools. Any use of AI must follow the guidelines set out in this policy.

To protect data when using generative AI tools, staff must:

- Seek advice from the data protection officer / senior leaders, as appropriate
- Check whether they are using an open or closed generative AI tool
- Ensure there is no identifiable information included in what they put into open generative AI tools
- Acknowledge or reference the use of generative AI in their work
- Fact-check results to make sure the information is accurate
- Ensure results are free from bias

All staff play a role in ensuring pupils understand the potential benefits and risks of using AI in their learning. They have a responsibility to guide pupils in critically evaluating AI-generated information and understanding its limitations.

A helpful tool to help staff consider the results provided by AI to determine their accuracy, detect bias and make other sensible checks can be found here: AI Classroom EDIT Matrix Free Resource courtesy of www.theaiclassroom.net

Staff must also follow the guidelines set out in Appendix C.

4.6 Students

- Students must follow the guidelines set out in Appendix B
- To protect the integrity of your work and avoid the risk of it being plagiarised or reused without consent, please only submit assignments for proofreading into *closed* generative AI platforms. Avoid using *open* or public AI tools, as these may store and reuse your content."

5. Use of new AI tools

5.1 Staff are encouraged to explore free AI tools available on the market, provided they adhere to the guidelines set out in Appendix C.

5.2 Prior approval is required when staff wish to use AI tools in a more advanced capacity — particularly where school-related or personal data may be shared. In such cases, staff must seek authorisation from the Trust Information Assurance Board, as outlined in Section 6.

6. Approval process

6.1 Staff are welcome to propose innovative uses of AI that enhance pupil outcomes or reduce workload. Initial discussions should take place with a senior leader, who will assess the proposal and determine whether it represents a viable new method of working.

6.2 If the proposal involves any form of data sharing, the senior leader must refer the request to the Trust Information Assurance Board.

6.3 The Information Assurance Board is responsible for approving AI use cases involving data, with decisions informed by:

- Advice from the Data Protection Officer (DPO)
- Completion of a Data Protection Impact Assessment (DPIA) where appropriate
- Alignment with the Trust's data protection and safeguarding policies

7. Effective use of AI

7.1 AI tools can be effective when used in the right way. Here are some examples of how they can be used within the Trust:

For Students:

- Exploring new ideas and topics.
- Getting simple explanations of complicated things.
- Checking your writing for spelling and grammar (as long as you always double-check yourself!).
- Coming up with ideas for creative projects (but make sure the main work is your own!).
- Using AI to help understand tricky texts.
- Using AI as a coach to help you understand and ask questions to help you revise and check your understanding of key topics / develop ideas for a piece of work/job application / UCAS application.

For Staff:

- Creating first drafts of teaching materials or lesson plans (but always review and change them yourself).
- Helping with some office tasks to save time.
- Identifying students who might need extra help.
- Looking at new ways to give feedback to students.

7.2 When using AI tools, all users should be aware of these key principles:

- Be Honest: If you use AI to help with your work, be clear about how you used it.
- Check Everything: Always check that AI information is correct and reliable. Don't just believe it without checking.
- Be Original: Make sure your work is based on your own ideas and effort. AI can help you understand or get ideas, but don't let it do the work for you.
- Think Carefully: Learn to think critically about the information that AI gives you.
- Stay Safe: Always follow online safety rules and age limits when using AI tools.

8. Things to remember and limitations

It's important to know that AI tools have limits and can have some risks:

- **Accuracy**: AI can sometimes give wrong or misleading information. Always check information from AI with other reliable sources.
- **Bias**: AI can sometimes show unfairness that was in the data sets it learned from. Always think critically about the information and consider different viewpoints.
- **Cheating:** Students must understand that using AI to create whole assignments or passing off AI's work as their own is wrong. All work you submit should be your own effort.
- **Data Privacy**: Be careful about the personal information you put into AI tools and follow the rules about keeping data safe. Don't enter any sensitive personal information.
- **Over-reliance**: AI should help you learn, not replace your own thinking, learning, and skills.
- **Human Teachers are Key**: AI can't replace the critical relationship between teachers and students.
- **Security Risks**: AI systems can have security weaknesses. We need to protect them from misuse or attack by protecting the data, the AI models, and the systems that run the AI.
- **Protect Data**: Do not upload any student or staff data to public AI tools. This includes names, grades, reports, or any other information that could identify someone. Sharing this kind of data without permission is a serious breach of privacy. You must also refer to the Trust's Data Protection Policy for further guidance on handling personal data. When using approved tools, such as Co-pilot, ChatGPT, and Gemini, ensure that you use the approved educational or enterprise versions, where available, and that appropriate data protection settings are enabled.

9. Misuse of AI

9.1 The following are examples of misusing AI and are not allowed:

- Submitting AI-generated work as your own without saying you used AI.

- Copying and pasting significant parts of AI-generated content without checking or understanding it.
- Using AI to cheat in tests or exams.
- Putting personal or sensitive data into AI tools that aren't approved.
- Letting AI do all the work without showing that you understand it and putting in your own effort.
- Trying to bypass security measures on AI systems.
- Using AI tools for any illegal or harmful activities.
- Uploading student or staff data to public AI tools. This will be treated as a serious disciplinary matter.

10. How the policy will operate and be reviewed

This policy will be shared with all key stakeholders: governors, staff, students, and parents/carers. The Trust will provide staff with training and support on how to use AI responsibly and securely. This policy will be checked regularly to ensure it's still relevant as AI technology changes and we receive more guidance from the DfE and security experts.

11. Additional security measures

11.1 To keep our AI systems and data safe, we will also:

- Regularly check our AI systems for vulnerabilities.
- Have plans in place to respond to any security incidents.
- Work with security experts to stay current on the latest threats.

Appendix A

Trinity MAT AI Strategy
We are on a journey to embrace the development of technology and AI, making conscious, well-informed decisions about its use, with ethics, safety and security always in mind.
We fundamentally believe that the human touch, understanding and perspective is always needed in our work.
Ethics, safety, security and wellbeing
We prioritise ethical, safe and secure AI use, always safeguarding wellbeing alongside technological progress.
Enhancing teaching and learning
AI enhances teaching and learning, supporting creativity, curiosity and personalised experiences that empower every learner.
Supporting efficiency with AI
We harness AI to streamline tasks, giving staff more time to focus on people and relationships.
Educating people for the now
Our community learns to use AI responsibly today, developing critical skills for an evolving digital society.
Preparing people for the future
We equip learners with knowledge and adaptability, ensuring confidence in facing opportunities and challenges of tomorrow.
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Appendix B

Student Guidance
Effective Use of AI

How You Can Use AI Positively

- **Explore Ideas and Topics:** Use AI tools to spark curiosity and gain an early understanding of new subjects.
- **Simplify Complex Concepts:** AI can explain difficult ideas in more accessible terms.
- **Check Your Writing:** Use AI to review spelling and grammar but always proofread and edit your own work.
- **Creative Inspiration:** Get ideas for stories, presentations, or projects but ensure the final output is your own.
- **Understand Tricky Texts:** AI tools can help decode difficult reading materials and support comprehension.

Key Principles to Follow

- **Be Honest:** Clearly say when and how you've used AI.
- **Double Check:** AI can make mistakes. Verify facts with reliable sources.
- **Be Original:** Your ideas and effort must shine through.
- **Think Critically:** Evaluate AI output and question bias or inconsistency.
- **Stay Safe:** Never enter personal or sensitive information into AI tools. If unsure, ask a teacher.

Misuse to Avoid

- Submitting AI work as your own without declaring it.
- Copying and pasting large sections from AI without checking or editing.
- Using AI to cheat in assessments or bypass real learning.
- Sharing personal details with unapproved AI tools.
- Letting AI do all the work without showing your understanding.

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Appendix C

Staff Guidance
Effective Use of AI

How You Can Use AI Positively

- **Drafting Teaching Resources:** Generate lesson materials or plans — always review and customise them.
- **Supporting Admin Work:** Automate simple tasks like proofreading or template creation.
- **Identifying Needs:** Spot patterns that may indicate students who need additional support.
- **Innovating Feedback:** Explore new ways of offering personalised, timely feedback.

Key Principles to Follow

- **Transparency:** Let students know when AI is used and why.
- **Accuracy Checks:** Always review AI-generated content — don't rely on it unfiltered.
- **Data Protection:** Never upload student or staff data to public AI tools.
- **Use Approved Tools Only:** Stick to tools like Copilot, ChatGPT, and Gemini in their enterprise/education versions with proper settings.
- **Policy Alignment:** Follow the Trust's Data Protection Policy, safeguarding principles, and all relevant IT protocols.

Misuse and Risks

- Uploading identifiable data (e.g. names, marks, reports) to public tools.
- Allowing AI to override professional judgement or safeguarding awareness.
- Using AI to do work without review or context.
- Employing AI for unethical, illegal, or policy-breaching activities.
- Attempting to bypass AI system restrictions.

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